

# **LAMBERT-ST LOUIS ANG BASE**

## **Environmental Management System**

### **Implementation Plan**



**April 2007**

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# Abbreviations and Acronyms

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|           |  |
|-----------|--|
| AFIT      | Air Force Institute of Training                                |
| ANG       | Air National Guard   |
| ANGB      | Air National Guard Base  |
| BEE       | Bioenvironmental Engineer                                      |
| CFT       | Cross Functional Team  |
| CSAF      | Chief Secretary of the Air Force                               |
| CSI       | Compliance Site Inventory                                      |
| DoD       | Department of Defense  |
| DUSD      | Deputy Under Secretary of Defense                              |
| EM        | Environmental Manager  |
| EMS       | Environmental Management System                                |
| EO        | Executive Order  |
| EPC       | Environmental Protection Committee                             |
| ESOHC     | Environmental Safety and Occupational Health Committee         |
| ESOHMS    | Environmental Safety and Occupational Health Management System |
| GSU       | Geographically Separated Unit                                  |
| HQ ANG CE | Headquarters Air National Guard Civil Engineer                 |
| ISO       | International Organization for Standardization                 |
| NLT       | No Later Than  |
| SECAF     | Secretary of the Air Force                                     |
| USAF      | U.S. Air Force   |



# Executive Summary

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Environmental Management Systems (EMS) provides organizations with a proactive, systematic approach for managing potential environmental consequences of their operations to ensure mission and operational readiness. An EMS provides a structured framework for:

- Identifying and evaluating environmental risk;
- Determining how the mission may be affected by environmental impacts;
- Organizing and managing significant environmental impacts; and
- Evaluating the effectiveness in achieving desired levels of environmental performance in support of mission and operational readiness.

Executive Order (EO) 13148, *Greening the Government through Leadership in Environmental Management*, 21 Apr 2000, directs all Department of Defense (DoD) facilities to implement an EMS by 31 Dec 05. In support of the EO, the U.S. Air Force (USAF) Chief of Staff and the Secretary of the Air Force (CSAF/SECAF) issued a joint memorandum, *Environmental Safety and Occupational Health Management Systems (ESOHMS)*, 05 Jan 01, directing the creation and implementation of an Air Force-wide ESOHMS similar in structure to the International Organization for Standardization (ISO) 14001. In response to the requirements and implementation criteria set forth by DoD, the USAF published specific EMS implementation metrics and milestones. As per the 30 Sep 2003 Headquarters ANG Civil Engineer (HQ ANG/CE) Memorandum, *Environmental Management System (EMS) Implementation*, ANG bases (ANGBs) will incorporate EMS into the delivery of unit level environmental services.

## EXHIBIT ES-1

### USAF EMS Implementation Metrics and Milestones\*

| USAF EMS Implementation Metrics                            | Milestone     |
|--|---------------|
| 1. Complete EMS Policy Statement                           | NLT 3 Jan 07  |
| 2. Prepare a written EMS Implementation Plan               | NLT 30 Apr 07 |
| 3. Prepare Prioritized List of Aspects                     | NLT 30 Jun 04 |
| 4. Provide EMS Awareness Training to Appropriate Personnel | NLT 30 Jun 05 |
| 5. Complete EMS Management Review                          | NLT 30 Jan 08 |

\*Source: Air Force Supplemental Guidance to the DoD EMS Implementation Criteria and Metrics

This plan satisfies the requirement for Lambert-St Louis ANGB development of a written EMS Implementation Plan. Following the USAF Supplemental Guidance, this plan incorporates information on the scope of the EMS, the structure and roles of the Installation's EMS Cross-Functional Team (CFT), and presents interim actions and deadlines developed to meet the USAF EMS implementation milestones.

# 1.0 Scope of the EMS

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USAF EMS implementation metrics require that installations define which organizations, sites, and facilities fall within the scope of their EMS. Typically, the scope of the EMS will include all organizations and facilities within the boundary of an installation, including tenant organizations. However, the scope may be limited by excluding certain organizations that have no significant environmental activities or have a different line of command authority.

Lambert-St Louis ANGB determined that the scope of its EMS will include tenants, organizations, sites, and facilities within the physical boundaries of the installation, as noted in Exhibit 1-1. The scope of the EMS will not include geographically separated units (GSUs) at this time; GSUs will be included later as part of the continuous improvement process. The EMS also will not include the Navy Reserve and Marine Reserve units/facilities at Lambert due to their separate command structure.

## Exhibit 1-1

Organizations Included in the Base EMS

| Organization / Tenant / Unit                     |  |
|--|--|
| 131 <sup>st</sup> Operations Group               |  |
| 131 <sup>st</sup> Maintenance Group              |  |
| 131 <sup>st</sup> Mission Support Group          |  |
| 131 <sup>st</sup> Medical Group                  |  |
| 239 <sup>th</sup> Combat Communications Squadron |  |

If it is later determined that existing or future facilities/organizations will be excluded from the scope of the Base's EMS, the following Air Force Facility Exclusion Guidelines will be followed:

- The HQ ANG may determine that no significant environmental activities take place on an installation or a specific site and thus choose to exclude these sites from the EMS requirement.
- The HQ ANG may exclude installations/sites from EMS requirements if inclusion would significantly interfere with military effectiveness or if it is determined to be in the nation's best interest.
- The HQ ANG Environmental Safety and Occupational Health Committee (ESOHC) Chair is the approval authority for installation/site exemptions.
- The HQ ANG must develop and maintain a list of excluded sites that includes a description of the activities that take place on the sites and a brief rationale for their exclusion. The HQ ANG ESOHC will review this list annually for accuracy.

## 2.0 EMS Cross Functional Team

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Lambert-St Louis ANGB members of the EMS CFT are responsible for establishing and implementing an EMS. The CFT is also responsible for providing a direct line of communication between the Installation Commander and the environmental management staff in each organization. As per USAF Supplemental

Guidance, this EMS Implementation Plan defines, by office symbol, which organizations will have a representative on the CFT and who will be the team lead. Exhibit 2-1 presents the members of the ANG EMS CFT.

## Exhibit 2-1

### EMS Cross Functional Team

| Cross Function Team Member(s)            | Organization           | Office Symbol | Representative Name       |
|--|------------------------|---------------|---------------------------|
| ESOHF Team Lead                          | 131 FW                 | SE            | Lt. Colonel Joseph Hruska |
| Environmental Manager                    | 131 MSG                | EM            | SSgt Allen Bear           |
| Bioenvironmental Engineering (BEE) NCOIC | 131 MDS                | SGPB          | MSgt Christopher Montoya  |
| Base Ground Safety Manager               | 131 FW                 | SE            | MSgt Kevin Cashion        |
| Logistics, HAZMART                       | 131 LRS                | LGSD          | MSgt Mike Evans           |
| Public Affairs                           | 131 FW                 | PA            | 2Lt. Bridget Zorn         |
| Legal                                    | 131 FW                 | JA            | Lt. Col Frank Rodman      |
| Contracting                              | 131 FW                 | MSC           | TSgt Mike Durbin          |
| Fire Protection                          | 131 CES                | CEF           | SSgt Michael Terranova    |
| Maintenance                              | 131 MXS                | CCQ           | CMSgt James Indelicato    |
| Maintenance                              | 131 MXS                | CCQ           | SMSgt Terry Fowler        |
| Flight Line                              | 131 AMXS               | CCQ           | MSgt Cecil Martin         |
| Civil Engineering                        | 131 CES                | CEF           | MSgt Patty Todd           |
| Power Pro                                | 239 <sup>th</sup> CBCS | CTCP          | MSgt Richard Hermeyer     |
| Vehicle Maintenance                      | 131 LRS                | LGRV          | MSgt James McCullough     |

## 3.0 EMS Cross Functional Team Responsibilities

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The roles and responsibilities of the Lambert-St Louis ANG Base CFT are as follows:

### 3.1 Policy

- Write a Base environmental policy that meets USAF guidance and ISO 14001 requirements.
- Review environmental policy annually and make necessary changes.
- Ensure that the policy is documented and implemented.
- Ensure that the policy is maintained and communicated to all employees and that it is available to the public.

### 3.2 Planning

- Assist in developing the EMS Implementation Plan.
- Establish, implement, and maintain a procedure for the identification of aspects and impacts that could have significant effect on the environment.
- Follow USAF EMS implementation guidance to identify and rank environmental aspects and impacts.
- Identify additional aspects not captured in the Compliance Site Inventory (CSI).
- Include tenants and GSUs, as appropriate, in the identification of significant environmental impacts.
- Establish, implement, and maintain Base environmental objectives and targets, including their time frames and means by which they will be achieved.
- Consider significant environmental aspects, legal requirements, technological operation, financial and operational requirements, views of interested parties, and the Base environmental policy when developing or reviewing objectives and targets.
- Ensure that objectives and targets are achieved and that necessary resources are dedicated toward that end.
- Ensure that significant aspects are updated as directed by Base EMS procedures.
- Establish, implement, and maintain procedures to identify impacts and have access to legal and other requirements that are directly applicable.
- Ensure that the EMS is incorporated into new programs, new tenants, or modified activities.

### 3.3 Implementation and Operation

- Ensure that appropriate training is provided to those personnel who perform tasks that may cause significant environmental impacts.



- Establish, implement, and maintain procedures for making personnel aware of:
  - The importance of conformance with environmental policy and EMS requirements to ensure impacts to mission, operations, and readiness are managed or avoided;
  - Actual or potential significant impacts from their work;
  - Environmental benefits of improved personal performance;
  - Role in achieving environmental policy, objectives, and targets; and
  - Consequences of not adhering to operating procedures.
- Establish, implement, and maintain procedures for communicating information on environmental aspects within the organization, responding to external communications about environmental issues, and communicating information about significant environmental impacts to the community.
- Establish and maintain an EMS manual describing the core elements of the Base's EMS.
- Establish, implement, and maintain procedures and responsibilities for identifying documentation locations, maintaining current versions, eliminating or marking obsolete versions, ensuring usability, and having authorized personnel review and revise documents.
- Ensure that procedures stipulating operating criteria are maintained for those activities and operations with significant impacts, including goods and services purchased by the Base and its tenants.
- Establish, implement, and maintain procedures that identify the prevention of, the potential for, and the response to accidents and emergency situations, including mitigation of environmental impacts.
- Review and revise emergency response procedures as necessary, but in particular, after the occurrence of accidents or emergency situations, including testing where practicable.

## 3.4 Checking and Corrective Action

- Review and evaluate EMS documentation.
- Manage the reactions to change brought about as a result of EMS implementation.
- Ensure EMS methodology is implemented consistently across the installation.
- Ensure successful implementation of the EMS in their respective organization.
- Establish, implement, and maintain procedures to monitor and measure on a regular basis the key characteristics of the operations and activities that can have a significant impact on the environment. Procedures will include monitoring, measuring, record keeping, equipment calibration requirements, and periodic review of compliance requirements.
- Establish, implement, and maintain procedures to handle and investigate nonconformance with EMS requirements. Procedures will contain identified authority, responsibility, and appropriate corrective action.
- Implement and maintain a records management program that includes procedures for the identification, maintenance, and disposition of environmental records. Environmental records will be legible, identifiable, and traceable to the activities or operations involved.
- Establish, implement, and maintain procedures for an annual EMS self-audit to determine whether the EMS is meeting USAF requirements and whether the EMS is properly implemented and maintained.

## 3.5 Management Review

- Ensure the EPC/ESOH Chair reports progress to the Installation Commander.
- Ensure the EPC/ESOH Chair updates implementation progress for USAF and DoD reporting.
- Ensure the EMS self-audit is conducted, and assess progress toward established objectives and targets, environmental policy, and other elements of the EMS. The audit should ensure conformance and continual improvement of the system. Review of materials, discussions, and actions will be documented.
- Review internal audit results, acting as an EMS Review Board. Assess progress towards the established objectives and targets, and determine and approve appropriate changes to the EMS.

## 4.0 EMS Implementation Milestones

The milestones for EMS implementation at the Lambert-St Louis ANGB are outlined in Exhibit 4-1. Interim milestones provide a roadmap and facilitate installation progress in the EMS implementation and ensure USAF milestones are met. ANG installations must report progress in EMS implementation Air Staff via Deputy Under Secretary of Defense (DUSD) data calls.

Exhibit 4-1

Base-Specific EMS Implementation Milestones

| Complete  | Milestone  | Date/Frequency         |
|---|--|------------------------|
| <b>Policy</b>   |  |                        |
| √   | <b>USAF Milestone: Develop an installation EMS policy statement</b>            | <b>NLT 31 Oct 2003</b> |
| <b>Planning</b>   |  |                        |
| √   | <b>USAF Milestone: Develop a written EMS Implementation Plan</b>               | <b>NLT 31 Mar 2004</b> |
|   | Complete preliminary inventory of aspects and impacts.                         | 21 May 2004            |
|   | Complete ranking exercise of aspects and impacts.                              |                        |
|   | Have appropriate personnel review ranking and provide comments.                | 04 Jun 2004            |
|   | Develop final list of significant aspects and impacts.                         | 18 Jun 2004            |
|   | <b>USAF Milestone: Prepare prioritized list of installation aspects.</b>       | <b>NLT 30 Jun 2004</b> |
| <b>Implementation and Operation</b>                       |  |                        |
|   | Have CFT, EM, and BEE participate in EMS Practitioner Training.                | 30 Jun 2005            |
|   | Provide EMS awareness level training to appropriate personnel at installation. | 30 Jun 2005            |
|   | <b>USAF Milestone: Complete awareness level training</b>                       | <b>NLT 30 Mar 2005</b> |
| <b>Checking and Corrective Action / Management Review</b> |  |                        |
|   | Perform EMS self-audit.  | 30 Oct 2007            |
|   | Complete management review.  | 30 Nov 2007            |
|   | Prepare action plans addressing result of management review.                   | 30 Jan 2008            |

|                         |  |  |
|-------------------------|--|--|
|                         | <b>USAF Milestone: Complete a management review of the EMS.<br/>Close major gaps/full conformance.</b> | <b>NLT 31 Dec 2005 and<br/>annually thereafter</b> |
| <b>EMS CFT Meetings</b> |  | Quarterly  |

**Note:** USAF EMS implementation milestones are in **bold**.

# Attachment 1 EMS Policy

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23 October 2006  
EXPIRES: 22 October 2007

MEMORANDUM FOR LAMBERT ANG BASE PERSONNEL

FROM: 131 FW/CC

SUBJECT: Environmental Policy Statement

1. The mission of the 131st Fighter Wing is to provide trained aircrews, personnel, equipment, and F-15 aircraft in support of U.S. Air Force requirements world-wide. Activities at the 131st FW include operating and maintaining F-15 fighter aircraft, corrosion control, aerospace ground equipment, vehicle maintenance, facilities maintenance, and administrative support. Lambert Air National Guard Base is committed to conducting its mission in an environmentally responsible manner that will protect human health, natural resources, and the environment. In doing so, we will comply with all environmental laws and regulations applicable to the conduct of our mission and strive for continual improvement in our environmental performance to include Environmental Protection Agency (EPA), Missouri Department of Natural Resources (MDNR), Air Force and St. Louis County requirements. This commitment goes beyond compliance with the law and encompasses the integration of sound environmental practices into our daily decisions and activities. We have in the past, and will continue in the future, to pursue a course of responsible environmental stewardship. In support of our environmental policy, we will:

a. Maintain an effective environmental management system, promote the use of safe technologies and operating practices, and remain ready to respond to emergencies in order to improve our environmental performance and minimize adverse impacts to installation workers, their families, and the environment.

b. Set environmental goals, measure progress, take corrective action when necessary, and communicate results and other environmental information regarding the installation's operations and its environmental accomplishments to workers, the community, suppliers, regulators and the public.

c. Working in partnership with all stakeholders, investigate and evaluate new and innovative technologies and practices as appropriate, establish and implement an effective pollution prevention program, minimize the generation of wastes, recycle materials otherwise destined to become waste when possible, and dispose of any remaining wastes in an environmentally responsible manner.

d. Ensure the responsible use of energy throughout the installation, including the adoption of innovative practices and procedures that will conserve energy and improve energy efficiency.

e. Promote the conservation and sustainable use of natural and manmade materials.

f. Provide regular operation-specific environmental performance reviews and assessments, develop plans to address actual or potential noncompliance situations, and build environmental concerns into all policies, programs, and missions.

2. Compliance with this Environmental Policy is the responsibility of everyone supporting this Wing including military, state, and civilian employees, contractors, and vendors in accordance with his or her role and responsibilities in the organization. This policy will be communicated to the public through posting on the Wing's public website.

3. The Office of Primary Responsibility (OPR) for this policy is the 131st Environmental Management Office (EMO).

ROBERT L. LEEKER, Col, MoANG  
Commander